

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DANIEL D'AMBLY, AARON WOLKIND, STEVE HARTLEY, RICHARD SCHWETZ, JOBEL BARBOSA, MATTHEW REIDINGER, JOHN HUGO, SEAN-MICHAEL DAVID SCOTT, THOMAS LOUDEN, ZACHARY REHL, AMANDA REHL, K.R., a minor, by and through her father ZACHARY REHL, and her mother AMANDA REHL, MARK ANTHONY TUCCI,

Plaintiffs,
vs.

CHRISTIAN EXOO a/k/a ANTIFASH GORDON, ST. LAWRENCE UNIVERSITY, TRIBUNE PUBLISHING COMPANY, NEW YORK DAILY NEWS, VIJAYA GADDE, TWITTER, INC., COHEN, WEISS AND SIMON, LLP, UNNAMED ASSOCIATES 1 - 100.

Defendants.

CIVIL ACTION
NO.: 2:20-cv-
12880-
JMV-JAD

Hon. John M.
Vazquez, U.S.D.J.

Return Date:
February 7, 2021

**DECLARATION OF RICHARD TORRES IN SUPPORT OF DEFENDANT
CHRISTIAN EXOO'S MOTION TO DISMISS PURSUANT TO F.R.C.P.
RULES 12(B)(2) AND 12(B)(6) AND MOTION TO STRIKE PURSUANT TO
F.R.C.P. RULE 12(F)**

RICHARD TORRES, an attorney admitted to practice in the State of New Jersey and the United States District Court for the District of New Jersey, hereby affirms under penalty of perjury that:

1. I am an attorney admitted to practice in this court. I represent Defendant Christian Exoo in the above referenced action.

2. I have personal knowledge of the matters stated herein and, if called upon I could and would competently testify thereto.

3. I submit this declaration regarding the attached exhibits.

4. Attached as Exhibit A are true and correct copies of postings from Philadelphia Proud Boys Telegram channels. The first is a post announcing Plaintiff Schwetz's expulsion from the Proud Boys created on September 14, 2019. The first post itself is located at: <https://t.me/phillypb/1466> and archived at: <https://archive.is/eVKMV> (last accessed Jan. 30, 2022). The second posting is from the Philadelphia Proud Boys News and Announcements Telegram channel: <https://t.me/philadelphiaproudboys/120> and archived at: <https://archive.is/alt8C> (last accessed Jan. 30, 2022).

I declare under penalty of perjury under the laws of the District of New Jersey and the laws of State of New Jersey that the facts set forth above are true and correct.

Executed this 31st day of January 2022, at Springfield, New Jersey.



Richard Torres, Esq.

DECLARATION OF RICHARD TORRES IN SUPPORT OF DEFENDANT CHRISTIAN EXOO'S MOTION TO DISMISS PURSUANT TO F.R.C.P. RULES 12(B)(2) AND 12(B)(6) AND MOTION TO STRIKE PURSUANT TO F.R.C.P. RULE 12(F) **P a g e | 2**

63 Tooker Avenue
Springfield, New Jersey 07081
E-mail: richardtorresdna@gmail.com

DECLARATION OF RICHARD TORRES IN SUPPORT OF DEFENDANT CHRISTIAN
EXOO'S MOTION TO DISMISS PURSUANT TO F.R.C.P. RULES 12(B)(2) AND 12(B)(6)
AND MOTION TO STRIKE PURSUANT TO F.R.C.P. RULE 12(F) **Page | 3**